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BOARD MEETING
STATE OF CALIFORNIA
INTEGRATED WASTE MANAGEMENT BOARD

RIVERSIDE COUNTY ADMINISTRATIVE BUILDING
COUNTY CHAMBERS
4080 LEMON STREET
RIVERSIDE, CA

RIVERSIDE COUNTY UPDATE PRESENTATION BY
MR. MATT HICKMAN,
RIVERSIDE COUNTY PROGRAM ADMINISTRATOR

WEDNESDAY, NOVEMBER 15, 2006

9:41 A.M.

KATHRYN S. KENYON, CSR
CERTIFIED SHORTHAND REPORTER
LICENSE NUMBER 13061

PETERS SHORTHAND REPORTING CORPORATION (916) 362-2345

APPEARANCES

BOARD MEMBERS

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Mr. Mark Leary, Executive Director

Mr. Elliott Block, Acting Chief Counsel

Ms. Julie Nauman, Chief Deputy Director

Ms. Kristen Garner, Executive Assistant

Mr. Jim Lee, Deputy Director, Special Waste Division

Mr. Howard Levenson, Deputy Director, Permitting &
Enforcement Division

Mr. Trevor O'Shaughnessy, Supervisor, State Agency
Assistance Section

ALSO PRESENT

Mr. Peter Anderson, Center for Competitive Waste Industry

Mr. Gordon Cooper

Mr. Roger Hanson

Ms. Patti Henshaw, Orange County

Mr. Matt Hickman, Riverside County

Mr. Hans Kernkamp, Riverside County

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APPEARANCES CONTINUED

Mr. Tim Miller, City of San Diego

Mr. Chuck Tobin, Burrtec Industries

Mr. John Tavaglione, Riverside County

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1 PARTIAL PROCEEDINGS

2 (Thereupon an overhead presentation was
3 presented as follows.)

4 MR. HICKMAN: Board members, first of all, thank
5 you on behalf of Riverside County and our department for
6 letting me present this to you.

7 The issue I bring, and the problem I bring forward
8 today, sometimes seems insurmountable, but I don't think
9 it is. I think there's an answer behind it; I think it's
10 flexible for rural counties. I think those types of
11 things can be taken into consideration, and we can fix
12 this issue. In the essence of time, I'm going to try to
13 move through it fast, but anybody can stop me at any time,
14 if they would like to ask a question.

15 --o0o--

16 MR. HICKMAN: Riverside County is unique, and it
17 is very different from what load check programs seem to be
18 operating throughout the state. For some reason,
19 Riverside County would -- we felt the need to very much
20 increase the level of effort that we're putting in our
21 load check program. And this presentation is going to
22 show the history and why that's occurred.

23 --o0o--

24 MR. HICKMAN: Why in Riverside County did we feel
25 it necessary to take that landfill-type uniform and change

1 that?

2 (Music plays from PowerPoint presentation.)

3 (Laughter.)

4 --o0o--

5 MR. HICKMAN: We felt we needed this type of --
6 this type of image to the public who was not listening to
7 us. We needed to get -- take away that dump employee
8 image and let them know that we are enforcing something
9 that is very serious.

10 --o0o--

11 MR. HICKMAN: Why in Riverside County has
12 Riverside County Waste Management put forward over 500
13 commercial incidents to the local district attorney and
14 investigating task force for assistance in prosecuting
15 some of these repeat offenders in larger cases? That's
16 very unusual.

17 --o0o--

18 MR. HICKMAN: So the presentation is basically
19 broken up, with Riverside County's hazardous waste
20 problem. Why don't other counties have this problem? And
21 what needs to be done?

22 --o0o--

23 MR. HICKMAN: First of all, in Riverside County,
24 we feel it's very deliberately done. It's very difficult
25 for any landfill employee to tell that customer, "You

1 can't dump that; take it back with you." There's a lot of
2 aggression that can take place at that time. It's very
3 difficult. People get very angry when they've realized
4 they have to make another trip.

5 It's also a cat-and-mouse game, where people try
6 to hide their hazardous waste; you know, they try to
7 outwit our waste inspectors and get it hidden.

8 --o0o--

9 MR. HICKMAN: We've also had several incidences
10 [sic] where it's obvious there's devious intent to hide
11 hazardous material -- to put hazardous material wrapped in
12 carpet and other means of disguising it.

13 --o0o--

14 MR. HICKMAN: We know that it's purposely put on
15 the bottom of 40-yard roll-off bins in an effort to hide
16 it. The drums, the barrels, the hazardous waste goes on
17 the bottom. The solid waste goes on the top.

18 --o0o--

19 --o0o--

20 MR. HICKMAN: We've also had injuries -- we've
21 also had injuries from hazardous waste coming into our
22 facilities. The one laying on the stretcher is one of our
23 load checkers. The one sitting in the ambulance is a --
24 is a solid waste transporter/truck driver for a hauler.

25 --o0o--

1 MR. HICKMAN: It was a gas cloud that erupted at
2 one of our landfills when a dozer ran over it.

3 --o0o--

4 MR. HICKMAN: Riverside County is also unique in
5 that it keeps very good records of the types of incidents
6 we've had; keep track of the responsible party, the
7 business where it came from; the hauler who hauled it to
8 us, exactly what was in the waste load; whether that
9 company has ever done it in the past; and we keep good
10 records of images of what took place on that day, where
11 this one person backed up -- just dumped the hazardous
12 materials out of the truck.

13 --o0o--

14 MR. HICKMAN: It's important to notice that we
15 worked very hard to keep the household hazardous waste out
16 of the tracks, but we can't lose sight; we need to
17 continue to focus on what we designed in this country in
18 the '70s and '80s.

19 We need to look at the big stuff too.

20 --o0o--

21 MR. HICKMAN: Our inspectors are trained to try to
22 find evidence of food dumped hazardous material.
23 Sometimes it's very easy, find something that might be put
24 in the load.

25 --o0o--

1 MR. HICKMAN: We do focus on the homeowners. They
2 get angry, but that's pretty easy; we can deal with them;
3 we educate them on the site.

4 But as I'm going through this, I would like you to
5 pay attention to the yellow highlighting on the top of the
6 page, and to ask yourself, Could that only be in Riverside
7 County?

8 --o0o--

9 MR. HICKMAN: This high school collected all its
10 auto shop waste and then threw it away, put it in the
11 solid waste stream.

12 --o0o--

13 MR. HICKMAN: This handyman was cleaning out
14 somebody else's business.

15 --o0o--

16 MR. HICKMAN: Movie theater, that's who dumped the
17 flammable liquids out of the back of the box trailer,
18 there.

19 --o0o--

20 MR. HICKMAN: Drug lab -- or drug rehab center who
21 does a lot of home cleanups.

22 --o0o--

23 MR. HICKMAN: He threw that away one day.

24 --o0o--

25 MR. HICKMAN: That's an environmental science

1 college teacher at a local college and teaches what
2 shouldn't go in the landfill.

3 --o0o--

4 MR. HICKMAN: He put in that handsome array from
5 his other -- because he didn't want to make two trips.
6 That's why we feel anybody will do this, and they are
7 doing it anywhere.

8 --o0o--

9 MR. HICKMAN: That's a hotel where they stored
10 that pesticide in the basement since the early '70s until
11 they decided to hide it on the bottom of a roll-up truck.

12 --o0o--

13 MR. HICKMAN: That's 55 gallons of acid that was
14 in that load with it. The pH is zero.

15 --o0o--

16 MR. HICKMAN: Nationwide sports companies who sent
17 out a message to stop distributing or stop selling
18 flammable product and to take it off the shelves. Most
19 distributors put it in the trash.

20 --o0o--

21 MR. HICKMAN: Nationwide home improvement
22 companies. You might recognize some of them. This is
23 when we start to realize this couldn't be a Riverside
24 County problem. These companies will start -- they didn't
25 have programs.

1 --o0o--

2 MR. HICKMAN: Other nationwide home improvement
3 companies.

4 --o0o--

5 MR. HICKMAN: Worldwide department stores. We're
6 telling our residents that they shouldn't throw this stuff
7 in the trash. These large worldwide companies should be
8 following the same rules.

9 --o0o--

10 --o0o--

11 MR. HICKMAN: A nationwide department store.

12 --o0o--

13 MR. HICKMAN: We had worked with this particular
14 department store for some time, trying to get them to stop
15 putting hazardous material in their waste bin. They
16 didn't listen to us -- (sound effects from PowerPoint
17 presentation) -- until their bin caught on fire behind
18 their store.

19 --o0o--

20 MR. HICKMAN: When the firemen got sick, the
21 hazardous material people had to come in and finish
22 putting out the fire. But it was our records that showed
23 we had contacted that company several times to try to get
24 them to stop doing just that.

25 --o0o--

1 MR. HICKMAN: Methamphetamine producers. Usually
2 don't handle their waste stream properly and it's in the
3 trash. And I would say that methamphetamine producers in
4 Riverside County have the same morals for waste management
5 as those at other counties.

6 --o0o--

7 MR. HICKMAN: We treat those like crime scenes.
8 We call the Special Investigations Bureau. They came out.
9 We've been credited for busting up a couple large labs in
10 Riverside County and putting a stop to it.

11 --o0o--

12 MR. HICKMAN: This material came from a farmer.
13 It's very, very dangerous explosive devices.

14 --o0o--

15 MR. HICKMAN: We have a lot of soldier of
16 fortune-type incidents or old military veterans that throw
17 away ordnance. We have a very good relationship with our
18 bomb squad. They provide free training for us.

19 --o0o--

20 MR. HICKMAN: That's a toxic smoke grenade that
21 came into one of our landfills.

22 --o0o--

23 MR. HICKMAN: This is a -- came from a movie
24 producer, and it's pyrophoric liquid. It reacts with
25 oxygen and ignites when it hits the air. And those are --

1 running over that, at the landfill, is a very serious
2 situation.

3 --o0o--

4 MR. HICKMAN: I know this is causing a lot of
5 commotion across the state, the medical waste situation
6 that we have down here.

7 --o0o--

8 MR. HICKMAN: In the beginning, the medical waste
9 problems were horrendous. The loads that were coming in
10 here were disguised in black bags. There was a tremendous
11 quantity. What was inside of those bags was completely
12 untreated.

13 --o0o--

14 MR. HICKMAN: We can all look away if we need to.
15 It was untreated and some of these were an administrative
16 decision not to treat and send it into the landfills.

17 --o0o--

18 MR. HICKMAN: The issues with just about every
19 large quantity medical waste producer has been coupled
20 with very large loads where the material wasn't treated,
21 whether it was in red bags or black bags. They were
22 coming in here and weren't being treated.

23 --o0o--

24 --o0o--

25 --o0o--

1 MR. HICKMAN: With -- I will move through those
2 quick.

3 But like I said, it was every large quantity
4 generator in Riverside County, and we had a problem that
5 needed to be straighted out. It's not done yet. Most of
6 those hospitals are on board, and we've really invoked
7 change that's very positive, to clean up that waste
8 stream. It's not done; it's not over; this was last week,
9 all in black bags from a large quantity producer where it
10 came in and what was in those bags absolutely required
11 treatment. But we are making tremendous headway.

12 --o0o--

13 MR. HICKMAN: There is an exposure issue for our
14 employees. They have to clean out the tracks of the dozer
15 about three times a day. There's -- hospital workers need
16 to know that there's an end exposure issue at the
17 landfill.

18 --o0o--

19 MR. HICKMAN: Transfer stations in Riverside
20 County, we have it kind of figured out on our own.

21 --o0o--

22 MR. HICKMAN: When we look at transfer stations,
23 we have to consider the out-of-county waste that we are
24 importing. Rural counties, now being the recipients of
25 that quantity of waste, need to also invoke these programs

1 and be able to feel comfortable and to have their
2 residents feel comfortable that they are not importing
3 something that's going to be harmful or expensive in the
4 future years.

5 --o0o--

6 MR. HICKMAN: It's impossible to inspect those
7 transfer trucks when they arrive at the landfill. At this
8 point, the businesses are all mixed together, the waste is
9 mixed together. It's very difficult to decide where it
10 came from and then to be able to do any back work and
11 follow-up to correct that business from doing it again.
12 That's why it has to have other transfer stations.

13 Our load check staff was asked to go to the
14 transfer stations and perform load checking. Our ordinance
15 allows us and gives us the authority to perform load
16 checks at those privately operated transfer stations.

17 --o0o--

18 MR. HICKMAN: Going to start moving through this
19 quickly. Basically, when my -- when we went there to
20 investigate their load check programs, we found minimal to
21 no load check activities, untrained employees, improperly
22 stored hazardous waste, and little to no enforcement of
23 prohibited waste. But they all have numerous waste
24 inspections showing none found.

25 --o0o--

1 MR. HICKMAN: Same transfer station with my staff,
2 three days of inspection, four hours each day. We've only
3 inspected 23 waste loads, 13 contained hazardous waste.
4 Four waste loads needed to be turned over to environmental
5 crimes to determine quantities or sources.

6 --o0o--

7 MR. HICKMAN: One was a department store.

8 --o0o--

9 MR. HICKMAN: Automotive painting facility that
10 had been throwing all its flammable automotive paints and
11 waste paints into the trash.

12 --o0o--

13 MR. HICKMAN: Cosmetic laboratory, we just asked
14 them to take the material back. They sent it back the
15 next day because they didn't think we would still be
16 there, and that's why we feel some of these things need to
17 be turned over for enforcement.

18 --o0o--

19 MR. HICKMAN: One week later that transfer station
20 agreed to get on board and try to correct this problem.

21 --o0o--

22 MR. HICKMAN: Within one week, they called us with
23 the largest load we had seen so far.

24 --o0o--

25 MR. HICKMAN: It came from a hazardous waste

1 contractor, licensed hazardous material transporter who
2 was getting money to collect the stuff from businesses and
3 then putting it through the solid waste stream.

4 --o0o--

5 --o0o--

6 MR. HICKMAN: Had we not stopped that load, it was
7 destined to be placed right on the very first layer of the
8 land system. We had to spend \$10 million on it and risked
9 a lot of lives and safety trying to get that system in to
10 protect the groundwater.

11 --o0o--

12 MR. HICKMAN: Okay. Another transfer station --
13 basically the same thing. We were finding this at our
14 transfer station, that there wasn't a lot of focused
15 effort to keep hazardous material out.

16 --o0o--

17 --o0o--

18 MR. HICKMAN: We found several businesses that
19 day: Hardware store.

20 --o0o--

21 MR. HICKMAN: Dollar Stores, they are everywhere.
22 Over 1100 aerosol canisters from a hardware store.

23 --o0o--

24 MR. HICKMAN: Organic peroxide being dumped on the
25 waste from a trailer manufacturer.

1 --o0o--

2 MR. HICKMAN: That's the flash that went off from
3 that same material at one of our landfills.

4 --o0o--

5 MR. HICKMAN: Acid from a manufacturing company.

6 --o0o--

7 MR. HICKMAN: Asbestos from a government-funded
8 school project where they were removing asbestos.

9 --o0o--

10 MR. HICKMAN: More drug lab waste.

11 --o0o--

12 MR. HICKMAN: Home cleanup companies.

13 --o0o--

14 MR. HICKMAN: That is Union Pacific.

15 --o0o--

16 MR. HICKMAN: Union Pacific dropped a tremendous
17 amount of extremely flammable material.

18 They -- this stuff burns at about 1300 degrees.
19 It melts two railroad tracks together. But it takes a
20 railroad flare -- or it takes a road flare to set it off.
21 They threw that away in the load, with it.

22 --o0o--

23 MR. HICKMAN: Several tons -- several hundred
24 pounds of this material.

25 --o0o--

1 MR. HICKMAN: Construction companies.

2 --o0o--

3 MR. HICKMAN: And Wyle Laboratories, one of the
4 largest laboratories in the United States, eight barrels,
5 4 pH; net zero 4 pH at 14.

6 --o0o--

7 MR. HICKMAN: Construction companies.

8 --o0o--

9 MR. HICKMAN: Paint contractors.

10 --o0o--

11 MR. HICKMAN: Chemical supplies.

12 --o0o--

13 MR. HICKMAN: Flooring companies.

14 --o0o--

15 MR. HICKMAN: Horse ranches.

16 --o0o--

17 MR. HICKMAN: Trailer parks.

18 --o0o--

19 MR. HICKMAN: Pool supplies.

20 --o0o--

21 MR. HICKMAN: General contractors.

22 --o0o--

23 MR. HICKMAN: Worldwide paint and powder coating
24 companies.

25 --o0o--

1 MR. HICKMAN: So when we looked about why don't
2 other counties have this problem -- I know this is causing
3 commotion. We have to start realizing that these are --
4 these companies are located everywhere. And we can start
5 focusing on what needs to be done.

6 --o0o--

7 MR. HICKMAN: What must be done?

8 Enforcement agencies must be provided new tools to
9 enforce effective load check programs, not that they just
10 have a program, but they have a program that's effective
11 or enforcement agencies must be provided new direction to
12 use present tools more effectively.

13 --o0o--

14 MR. HICKMAN: State minimum standards, somewhat
15 vague -- vague and confusing.

16 --o0o--

17 MR. HICKMAN: But when we look at this, the first
18 thing is to prevent the acceptance of hazardous waste.

19 --o0o--

20 MR. HICKMAN: A typical account like this can give
21 you two truckloads a week.

22 --o0o--

23 MR. HICKMAN: And we know that those accounts
24 bringing two truckloads a week, if they're managing their
25 waste -- their hazardous waste through the solid waste

1 system, it's going in there every week.

2 --o0o--

3 MR. HICKMAN: Present standards and the random
4 load check program might grab two of those trucks.

5 --o0o--

6 MR. HICKMAN: This is what we're finding to be
7 industry standard out there -- industry standard operating
8 procedures: the load selected for a load check; hazardous
9 waste found; hazardous waste stored on on-site -- in the
10 on-site storage bin; hazardous waste properly disposed of
11 by the disposal company.

12 --o0o--

13 MR. HICKMAN: No contact made to that company to
14 let them know that they've done something wrong; the
15 hazardous waste is accepted by the solid waste facility
16 even though they manage it right out of the two loads.

17 --o0o--

18 MR. HICKMAN: The responsible party continues to
19 throw hazardous waste into that load every two weeks,
20 because they were never told otherwise.

21 --o0o--

22 MR. HICKMAN: So when we look at it, they
23 prevented the acceptance at least as far as the proper
24 disposal out of two loads, but they accepted that waste.

25 But there was waste in every load. So the end

1 result is that waste is accepted in every load. And the
2 original goal was to prevent the acceptance of hazardous
3 waste.

4 --o0o--

5 MR. HICKMAN: Okay. What laws apply?

6 When we look at Title 14, what can be used?

7 Accepting hazardous waste at a facility not
8 authorized to accept it, that law's being broken;

9 In violation of Hazardous Waste Release/Spill
10 Reporting requirements. That law's being broken.

11 Causing the disposal of any hazardous waste at a
12 facility not authorized to accept it, when that waste is
13 then sent to our facilities, that law is being broken.

14 --o0o--

15 MR. HICKMAN: The number of inspectors who decides
16 random inspections alone don't work. That's the issue.
17 They just don't work.

18 --o0o--

19 MR. HICKMAN: Don't waste time walking around a
20 load. No signs of hazardous waste, move on to the next
21 load.

22 --o0o--

23 MR. HICKMAN: Target loads. Get in a safe vantage
24 point; see hazardous waste; ask the equipment to stop; and
25 inspect that load.

1 Riverside County inspects less than 1 percent of
2 its incoming loads to find this much hazardous waste. No
3 one has ever said in Riverside County, "Inspect every
4 load." We know that's not feasible, it's not possible,
5 and it's very much not necessary.

6 --o0o--

7 MR. HICKMAN: Most loads requiring inspection are
8 very easy to spot from a distance.

9 --o0o--

10 MR. HICKMAN: This one deserved an inspection when
11 it rolled into our facility and ended up with 60 drums of
12 flammable compressed gas cylinders.

13 --o0o--

14 MR. HICKMAN: A location for the storage, that's
15 also an issue.

16 --o0o--

17 MR. HICKMAN: We feel, in most places, it's not
18 adequate. They would be getting loads like this if they
19 would have an active load check program. We have to hold
20 that as evidence so there can be contact and the
21 responsible party could be held responsible for that
22 waste.

23 --o0o--

24 MR. HICKMAN: So are they equipped to store all
25 these cases?

1 --o0o--

2 MR. HICKMAN: What we find is all the manifests
3 just show latex paint -- they show latex paint or oil.
4 But there's a lot of classes coming. They need to be
5 equipped to handle that.

6 --o0o--

7 MR. HICKMAN: What laws apply?
8 If they are improperly storing, all these laws
9 apply.

10 --o0o--

11 MR. HICKMAN: The minimum standards also state
12 training. We feel that's a huge issue.

13 Personnel need to be trained in the proper
14 handling in the disposition of that waste and also
15 recognition. I missed that.

16 --o0o--

17 MR. HICKMAN: But the disposition of that waste:
18 Who owns it? Where does it belong? Who is responsible
19 for that waste?

20 The trained load checkers will find hazardous
21 waste. That's very true. If we train them, they are
22 going to find it.

23 We did receive a grant, and we trained our waste
24 inspectors. Received a grant from the Integrated Waste
25 Management Board and started this program.

1 But a laborer cannot approach that load safely,
2 and he cannot make a determination whether that's
3 acceptable solid waste or hazardous waste.

4 We feel formal training is needed. They need
5 safety tips -- safety meetings are not enough, but yet
6 it's being allowed.

7 All facility staff meets hazardous waste
8 recognition, so those are operating, knows he needs to
9 stop if he sees that waste in a load. They need to be
10 encouraged to stop.

11 Load checkers need detailed hazardous waste
12 training, health and safety training. Those employees are
13 expected to handle this material.

14 And they need to store and compact it if they are
15 running their program properly.

16 --o0o--

17 MR. HICKMAN: What's missing in Title 14?

18 --o0o--

19 MR. HICKMAN: The requirement for an adequate
20 number of inspections and requirements. Act when
21 hazardous waste is spotted. Requirements to report legal
22 disposal to the EA or CUPA. That's missing, because it
23 was buried in 27 and doesn't apply to the transfer
24 stations.

25 --o0o--

1 MR. HICKMAN: So this does not apply to transfer
2 stations. However, this law does apply: Health and
3 Safety Code requires any employee of any hazardous
4 material handler to report.

5 --o0o--

6 MR. HICKMAN: Facility inspections, when they are
7 being performed, we can't believe the drivers inspect
8 these loads before we pick them up. That's a statement;
9 that's a red flag.

10 --o0o--

11 MR. HICKMAN: The drivers admit to us, it's
12 impossible to inspect the waste when it's in the bin. The
13 hazardous waste is hidden on the bottom, just like the
14 yogurt. The fruit's on the bottom. And it's done
15 purposely.

16 --o0o--

17 MR. HICKMAN: Facility inspections, we need to
18 stop believing we would never have hazardous waste
19 incidents here at the Riverside County problem. The
20 offenders are too numerous. The people who are throwing
21 waste away, the companies, they're too numerous and the
22 variety is too large.

23 --o0o--

24 MR. HICKMAN: These waste inspection programs,
25 they work, and they are not that difficult.

1 With several private entities, private transfer
2 stations, and Riverside County have volunteered to
3 increase their load checking programs and have been
4 extremely successful at it. We understand that in the
5 rural areas, some of that ability is not there. But we
6 can't look at large counties and expect them to act like a
7 rural county. There's tremendous commercial material
8 coming through these transfer stations and being brought
9 to our counties.

10 These programs work. That's the effectiveness of
11 our program. We have a very good computer program that
12 tracks that.

13 --o0o--

14 MR. HICKMAN: What laws apply also?

15 California Business and Professional Code.

16 Landfills and transfer stations that obey these
17 laws have a very disadvantage [sic] over ones that are
18 granting them and not obeying these laws. It's very --
19 it's much more inexpensive to operate a facility when you
20 don't focus on these laws.

21 --o0o--

22 MR. HICKMAN: From Riverside County Waste
23 Management, I think we have a very effective program
24 going. I want to thank you for letting us share this with
25 you.

1 (Applause.)

2 CHAIRPERSON BROWN: Thank you, Matt. That was
3 very informative. Appreciate that.

4

5

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1 CERTIFICATE OF REPORTER

2 I, KATHRYN S. KENYON, a Certified Shorthand
3 Reporter of the State of California, do hereby certify:

4 That I am a disinterested person herein; that
5 the foregoing California Integrated Waste Management
6 Board's full Board meeting was reported in shorthand by
7 me, Kathryn S. Kenyon, a Certified Shorthand Reporter of
8 the State of California, and thereafter transcribed into
9 typewriting.

10 I further certify that I am not of counsel or
11 attorney for any of the parties to said meeting nor in any
12 way interested in the outcome of said meeting.

13 IN WITNESS WHEREOF, I have hereunto set my hand
14 this 24th day of November, 2006.

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22

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